

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ  
SECURITIES LITIGATION

Case No. 1:19-cv-01339

Honorable Robert M. Dow Jr.

**DECLARATION OF KATHERINE M. SINDERSON IN SUPPORT OF  
PLAINTIFFS' REPLY MEMORANDUM IN FURTHER SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Katherine M. Sinderson, declare as follows:

1. I am an attorney licensed to practice law in New York, and I am admitted to practice *pro hac vice* before this Court. I am a partner in the law firm of Bernstein Litowitz Berger & Grossmann LLP ("BLB&G"). BLB&G, together with Kessler Topaz Meltzer & Check, LLP, are Lead Counsel for Lead Plaintiffs Union Asset Management Holding AG ("Union") and Sjunde AP-Fonden ("AP7"), and additional named Plaintiff Booker Enterprises Pty Ltd. ("Booker") (collectively, "Plaintiffs"). I submit this Declaration in Support of Plaintiffs' Reply Memorandum in Further Support of Plaintiffs' Motion for Class Certification.

2. Attached hereto as Exhibits 1 through 15 are true and correct copies of the following documents:

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|------------|--|
| Exhibit 1: | Expert Reply Report of David I. Tabak, Ph.D., dated July 19, 2022  |
| Exhibit 2: | List compiled by Plaintiffs' counsel of securities class action cases rejecting <i>Comcast</i> arguments |
| Exhibit 3: | June 8, 2022 discovery correspondence from Jesse L. Jensen to Andrew J. Ehrlich                          |
| Exhibit 4: | Excerpts of the June 23, 2022 deposition transcript of Defendants' expert Dr. Allen Ferrell              |

- Exhibit 5: Excerpts of the June 29, 2022 deposition transcript of Defendants' expert Mr. Lawrence Smith
- Exhibit 6: Excerpts of the May 4, 2022 deposition transcript of Union representative Mr. Jochen Riechwald
- Exhibit 7: Excerpts of the May 4, 2022 deposition transcript of Union representative Dr. Carsten Fischer
- Exhibit 8: Plaintiffs' Objections and Responses to the Kraft Defendants' First Request for Production of Documents, served on December 15, 2021
- Exhibit 9: Plaintiffs' Responses and Objections to Defendants' First Set of Interrogatories, served on December 15, 2021
- Exhibit 10: Objections to Defendants' First Amended Notice of Rule 30(b)(6) Deposition of Lead Plaintiff Union Asset Management Holding AG, served on April 20, 2022
- Exhibit 11: Certified translation of a document produced on April 1, 2022 by Union bearing the Bates number UNION0024613
- Exhibit 12: Declaration of Bimal Shah on behalf of Northern Trust Global Investments Limited ("Northern Trust") provided by third party Northern Trust in response to Defendants' subpoena to Northern Trust and produced by Defendants to Plaintiffs on June 21, 2022, bearing the Bates numbers KHC\_03616879-KHC\_03616883
- Exhibit 13: Excerpts of the April 26, 2022 deposition transcript of AP7 representative Mr. Richard Gröttheim
- Exhibit 14: Document produced by third party BlackRock, Inc. ("BlackRock") in response to Defendants' subpoena to BlackRock and produced by Defendants to Plaintiffs on March 28, 2022, as introduced as Exhibit No. 28 at the April 26, 2022 deposition of Mr. Gröttheim
- Exhibit 15: Excerpts of the April 25, 2022 deposition transcript of Booker representative Mr. Luke Booker

3. As of the date of this declaration, Union has collected and reviewed more than 72,000 documents, and produced to Defendants more than 7,200 documents totaling more than 53,000 pages of material from the files of 18 Union custodians. In connection with its document collection, Union ran comprehensive search terms including "KHC," "Kraft Heinz," "Heinz," and "500754106," and others, in searching the custodial files of the portfolio managers of the twenty-two funds that assigned their claims to Union in this action as well as the custodial files of Mr.

Jochen Riechwald and Dr. Carsten Fischer, Union's head of corporate law and general counsel, respectively.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: July 19, 2022

New York, New York



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Katherine M. Sinderson

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